



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**JAN 10 2013**

Commander Brian Gilda, Sector Commander  
United States Coast Guard Group Portland  
259 High Street  
South Portland, ME 04106-0007

Re: Clean Air Act Reporting Requirement

Dear Commander Gilda:

On September 13, 2012, The United States Environmental Protection Agency ("EPA") issued United States Coast Guard Sector Northern New England, located at 259 High Street in South Portland, Maine ("USCG"), a reporting requirement under the authority of the Clean Air Act ("CAA" or "Act"). On November 8, 2012, USCG submitted its response to EPA. However, the response was incomplete. This purpose of this follow-up reporting requirement is to ask additional questions and to clarify some of the questions in the original reporting requirement. USCG must to provide the information listed in each numbered paragraph below within fifteen (15) days of receipt of this letter. If USCG does not possess some or all of the records or documents that respond to a specific request below, the USCG shall provide a written explanation for its inability to respond.

As you know from our previous correspondence, EPA is evaluating whether the operations at USCG are in compliance with the CAA and requirements promulgated there under. These include: federally-approved portions of Maine Department of Environmental Protection ("ME DEP") Air Pollution Control Regulations; the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines found at 40 CFR Part 60, Subpart JJJJ ("Subpart JJJJ"); the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines found at 40 CFR Part 63, Subpart ZZZZ; and the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating) found at 40 CFR Part 63, Subpart II.

Section 114(a)(1) of the Act, 42 U.S.C. Section 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

## Reporting Requirement Questions

1. Provide the vapor pressure for the “Super Aquatene GM360” solvent, currently in use in the cold parts washer located in the “Industrial Support Detachment” workshop, measured in mm Hg at 20 °C (68° F). In the event that this solvent has been replaced with another solvent, then provide the vapor pressure of the “Super Aquatene GM360” solvent as well as the following information about the new solvent as required by Chapter 130 of the ME DEP Air Pollution Control Regulations, Section 3. C.:
  - a. The name and address of the solvent supplier;
  - b. The name and type of solvent, including the product or vendor identification number;
  - c. The vapor pressure of the solvent measured in mm Hg at 20 °C;
  - d. The percent VOC content by weight; and
  - e. The date the facility started using the above described solvent.
2. Provide the following information about the electrical generator, located in Building 3A, model number LSG-8751-6005-A, for the last 5 years:
  - a. Individually itemized records (e.g., log book pages) describing the hours of operation and purpose of operation (e.g., to perform routine maintenance, to provide emergency power);
  - b. Documentation of the manufacturer’s maintenance requirements, or a maintenance plan that was developed for the generator in-house; and
  - c. Individually itemized records (e.g., log book pages) demonstrating that the facility is performing the required maintenance as described in the documentation provided in section above.
3. Provide documentation that the emergency electrical generator located between buildings 1 and 3, model number 125PGC6NLT1, is certified to be compliant with either the applicable emissions standards in Table 1 of Subpart JJJJ, or the emissions standards for new nonroad SI engines in 40 CFR Part 1048, applicable to engines that are not severe duty engines. In addition, provide evidence that the certification covers the use of fuel that meets the definition of pipeline-quality natural gas.<sup>1</sup>

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<sup>1</sup> Subpart JJJJ, Section 60.4241(d) states:

*Manufacturers of natural gas fired stationary SI ICE who conduct voluntary certification of stationary SI ICE to the emission standards specified in § 60.4231(d) or (e), as applicable, must certify their engines for operation using fuel that meets the definition of pipeline-quality natural gas. The fuel used for certifying stationary SI natural gas engines must meet the definition of pipeline-quality natural gas as described in § 60.4248. In addition, the manufacturer must provide information to the owner and operator of the certified stationary SI engine including the specifications of the pipeline-quality natural gas to which the engine is certified and what adjustments the owner or operator must make to the engine when installed in the field to ensure compliance with the emission standards.*

Furthermore, Section 60.4231 (e) states:

*Stationary SI internal combustion engine manufacturers who choose to certify their stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) under the voluntary manufacturer certification program described in this subpart must certify those engines to the emission standards in Table 1 to this subpart. ... For stationary SI ICE with a maximum engine power greater than or equal to 100 HP (75 KW) and less than 500 HP (373 KW) manufactured prior to January 1, 2011, and for stationary SI ICE with a maximum engine power greater than or equal to 500 HP (373 KW) manufactured prior to July 1, 2010, manufacturers may choose to certify these engines to the certification emission standards for new nonroad SI engines in 40 CFR part 1048 applicable to engines that are not severe duty engines.*



4. For each temporary or permanent paint booth (i.e., any enclosure in which painting by brush, roller or spray gun occurs) located at the facility from January 2007 to the present, provide the following information:
  - a. The name/identifier and location;
  - b. The date that actual construction began;
  - c. The date that actual construction was completed;
  - d. The date that any surface coating operations began;
  - e. A description of any air pollution control equipment; and
  - f. A description of any best management practices utilized to limit air pollution from the booth.
5. Provide documentation that the DUX Pressure feed HVLP spray gun, observed by the EPA during the inspection dated July 2, 2012, is no longer being used or located at the facility (e.g., provide documentation or an affidavit indicating that it was shipped off site, sold, or destroyed).
6. For the calendar years 2010, 2011 and 2012, provide the following information:
  - a. The name of each vessel that was painted, in part or in whole, at the facility and the dates (start and finish) the painting of the vessel occurred;
  - b. A description of the extent of the painting (e.g., hull and deck were painted);
  - c. The location of the painting activity (e.g., paint booth, dock side)
  - d. The type and quantity of each coating (e.g., paints, thinners, cleaners, latex products, solvents, fairing compounds, adhesives – see the categories specified in 40 CFR Part 63, Subpart II, Table 2, where applicable) or resin (e.g., gel coat, skin coat, resin, hardener, filler, promoter, catalyst) used for each vessel;
  - e. The total Volatile Organic Compound (“VOC”) content of each coating in lbs VOC per gallon of coating. The VOC content must come from the manufacturer of the coating. If the manufacturer provides a range, use the upper bound of the range; and
  - f. The total Hazardous Air Pollutant (“HAP”) content of each coating in lbs HAP per gallon of coating. The HAP content must come from the manufacturer of the coating. If the manufacturer provides a range, use the upper bound of the range;

Provide your response using the enclosed blank spreadsheet labeled “Coatings - As Used” or an equivalent spreadsheet format. Do not include coatings contained in hand held non-refillable containers.

7. For the calendar years 2010, 2011 and 2012, provide:
  - a. The name and location of any other company, contractor, or subcontractor to the US Coast Guard that performed painting activities on USCG vessels home ported in USCG Group's area of responsibility (i.e. from the North, at Port Clyde, Maine, southward to the NH/MA border, just south of Hampton Harbor, NH); and
  - b. Provide copies of all active contracts with outside parties for the resurfacing, including surface preparation and/or coating of USCG vessels home ported in USCG Group's area of responsibility.

Submissions required by this letter shall be mailed to:

Susan Studlien, Director  
Office of Environmental Stewardship  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Attn: Darren Fortescue (OES 04-2)

Be aware that if USCG does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

USCG may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R §2.203(b). Information subject to such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to USCG. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this reporting requirement, please contact Darren Fortescue, Environmental Engineer, at (617) 918-1162, or have your attorney call Tom Olivier, Senior Enforcement Counsel, at (617) 918-1737.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship

cc: Kurt Tidd, ME DEP

Enclosures

**United States Coast Guard Group Portland**

259 High Street

South Portland,

**ME**

Note: Use VOC and HAP content from manufacturer - if given range, use upper bound

Note: For type of coating, see the categories specified in 40 CFR Part 63, Subpart II, Table 2, where applicable

**Coatings - As Used**

Vessel Name	Start Date	End Date	Description of Painting Performed (Hull, Deck, etc.)	Location of Painting (Dock side, Paint Booth etc.)	Name of Coating / Gel Coat / Resin (Include part no.)	Part Number / Serial Number	Type of Coating / Gel Coat / Resin Used (including but not limited to paints, gel coats, thinners, cleaners, latexes, solvents, acrylics, hardners, sealing and release agents, mold stripping agents, etc.)	Amount of coating, gel coat, or resin used (gallons)	Total VOC content of coating, gel coat, or resin (lbs VOC / gallon of coating)	Total HAP content of coating, gel coat, or resin (lbs HAP / gallon of coating)
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